

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA.

CASE NO: 00-6309-^{CR}~~CF~~-SEITZ

UNITED STATES OF AMERICA,

Plaintiff,

-vs-

JULIUS BRUCE CHIUSANO,

Defendant.

MOTION FOR PERMISSION TO TRAVEL

COMES NOW, the Defendant, JULIUS BRUCE CHIUSANO, by and through undersigned counsel and pursuant to the Federal Rules of Criminal Procedure, and respectfully requests this Honorable Court enter an Order permitting the Defendant to leave the State of Florida, and travel to Foxwoods Resort, Foxwood, Connecticut, and for grounds, would show unto the Court the following;

1. That the Defendant, JULIUS BRUCE CHIUSANO, is presently released on a fifty thousand dollar corporate surety and a fifty thousand dollar personal surety bond with supervised release.
2. That the Defendant is also released on bond on a one hundred thousand dollar corporate surety bond in Case No. 00-6273-Cr-Huck.
3. That the Defendant has been on supervised release since October 5, 2000.
4. That this Honorable Court's previous Order entered on June 8, 2001 is moot as the Defendant's travel plans were cancelled and the Defendant did not exercise the travel permission.
5. That the Defendant respectfully requests this Honorable Court permit the Defendant to travel to Foxwoods Resort, Foxwood, Connecticut for a weekend holiday and to visit family.
6. That the Defendant desires to travel outside of the State of Florida for approximately Three (3) days beginning on or about July 20, 2001 and returning July 22, 2001.
7. That a copy of the Defendant's Itinerary is attached hereto as Defendant's Exhibit

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One (1).

8. That undersigned has spoken to the Pretrial Services officer, Raul Sagaro, regarding this travel permit and he has no objection.

9. That prior to the Defendant's departure the Defendant will provide addresses and telephone numbers where he will be staying to Raul Sagaro of the Pretrial Services Office in Dade County, Florida, as required under Defendant's terms and conditions of supervised release and report immediately upon his return to the jurisdiction.

WHEREFORE, by reason of the foregoing, the Defendant, JULIUS BRUCE CHIUSANO, respectfully requests this Honorable Court enter an Order granting the Defendant's request permitting the Defendant to travel outside the State of Florida to Foxwoods Resort, Foxwood, Connecticut.

10-G CERTIFICATE

That undersigned counsel, pursuant to Local Rule 10(G)(1) certifies that he has contacted the opposing counsel, Assistant United States Attorney, Diane Fernandez on behalf of Brian McCormick, of the Southern District of Florida in an effort of good faith to resolve by agreement the subject matter and she states that she has no objection to the granting of this motion.

I HEREBY CERTIFY that a copy of the foregoing has been furnished to Diane Fernandez, Assistant United States Attorney, on behalf of Brian McCormick, Assistant United States Attorney, United States Attorney's Office, 299 East Broward Boulevard, Fort Lauderdale, FL 33301, by Facsimile (954-356-7230) and Raul Sagaro, Pretrial Services, 330 Biscayne Blvd., Suite 500, Miami, FL 33132, by Facsimile 305-530-7123, and by U.S. Mail, and the original hereof filed with the Clerk of the Court, by Hand Delivery, this 12th JULY, 2001.

Respectfully submitted,

DONALD R. SPADARO, P.A.
Attorneys for DEFENDANT/CHIUSANO
1000 South Federal Highway
Suite 103
Fort Lauderdale, Florida 33316
Telephone: (954) 763-5504

By: 

DONALD R. SPADARO, ESQUIRE

- Departure Information:

Friday, July 20th from Ft. Lauderdale International Airport
Terminal 4 at the JET CENTER COUNTER. Our charter departs at 10:00am and arrives
in Providence, RI at 12:45pm

You must be at the airport **NO LATER** than 8:45am to check-in. Please make sure that the name of the person to whom the room is registered is clearly written on the enclosed luggage tags. Your luggage will be handled at the airport and delivered to Foxwoods.

- Hotel Check-In Information: Upon arrival at the hotel, **you must post a credit card** or leave a cash deposit in order to charge incidentals to the room (phone calls, food, movies, room service, etc.). Your luggage will be delivered to your room after you arrive at the hotel.
- Hotel Departure: Please have your bags packed and inside your room for the bellman pick-up by 12:00pm (noon). You will meet the group in the lobby of the Pequot Tower **NO LATER** than 3:00pm on Sunday for departure to the airport.

Your flight is scheduled to depart Providence at 6:00pm
and arrive in Ft. Lauderdale at 9:00pm